

EXHIBIT M

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Drew J. Ribar,
Plaintiff,
v.

State of Nevada ex rel. Nevada Department of Corrections, Carson City, et al.,
Defendants.

Case No. 3:24-cv-00103-ART-CLB

EXHIBIT M – EMAIL NOTICE OF SOCIAL MEDIA CENSORSHIP

(Bates No. EX031)

Filed in Support of Amended Complaint and Summary Judgment Motion (Fed. R. Civ. P. 56)

Plaintiff Drew J. Ribar, pro se, submits Exhibit M, an email sent by Plaintiff to Carson City District Attorney Jason Woodbury and Sheriff Ken Furlong on January 19, 2024, obtained via Plaintiff's records and Carson City's public email system. Filed manually per LR IC 2-2 with a Notice of Manual Filing, this exhibit stands alone as evidence of Plaintiff's **pre-censorship notice** to Defendants of First Amendment violations, while cross-referencing Exhibits C, D, E, F, H, I, J, K, and L to support Plaintiff's claims and Rule 56 motion.

Key Evidence and Legal Violations:

PLEADING TITLE - 1

Section	Incident	Legal Relevance	Cross-Reference
		First Amendment retaliation	
		— pre-censorship notice	
		ignored, followed by continued	
	Plaintiff emails DA	deletions (Exhibit L), violates	
	Woodbury and Sheriff	public forum speech	Exhibits C
	Furlong (1/19/2024),		(01:01:40.583,
	reporting CCSO deletion of	(<i>O'Connor-Ratcliff v. Garnier</i> ,	01:05:13.333), D
Email	comments about Plaintiff's	601 U.S. ___, 144 S. Ct. 717	(0:20:56), E (0:01:04–
Notice	arrest video (Exhibit C),	(2024); <i>Knight First</i>	0:01:20), F (EX001–
(Bates	citing <i>O'Connor-Ratcliff v.</i>	<i>Amendment Inst. v. Trump</i> , 928	EX002), H (EX016–
EX031)	<i>Garnier</i> , and requesting	F.3d 226 (2d Cir. 2019);	EX018), I (EX019–
	cessation of censorship;	<i>Packingham v. North Carolina</i> ,	EX021), J (EX027), K
	precedes CCSO deletions of	582 U.S. 98 (2017)); <i>Monell</i>	(EX028), L (EX029–
	33 comments (1/22–	custom post-arrest (Exhibit F)	EX030)
	1/23/2024).	and dismissal (Exhibit K); ties	
		to retaliation for recording	
		(<i>Nieves v. Bartlett</i> , 139 S. Ct.	
		1715 (2019)).	

Legal Claims Supported:

- 1 • **First Amendment (42 U.S.C. § 1983):** Retaliatory censorship following a notice violates
2 public forum rights (*O'Connor-Ratcliff v. Garnier*, 144 S. Ct. 717 (2024); *Knight*,
3 *Davison*, *Packingham*, *Fordyce*, *Glik*, *Irizarry*, *Nieves*, *Umbehr*, *Mack v. Williams*).
- 4 • **Fourth Amendment:** Ongoing retaliation tied to malicious prosecution (*Thompson*,
5 *Devenpeck*, *Soldal*).
- 6 • **Fifth Amendment:** Late Miranda warning (Exhibit D), fueling censorship.
- 7 • **Eighth Amendment:** Hotboxing (95°F, no ventilation), censored in comments.
- 8 • **Fourteenth Amendment:** Procedural due process violations (*Mathews*, *Parratt*);
9 economic harm to A&A Towing (*Meyer*, *Lewis*).
- 10 • **Municipal Liability:** Post-notice censorship ratified by CCSO and DA despite warning
11 (*Monell*).
- 12 • **State Law Claims:** Oppression under color of law (NRS 197.200), interference with
13 economic advantage (28 U.S.C. § 1367).
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19 **Summary Judgment Purpose (Fed. R. Civ. P. 56):**

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21 Exhibit M's **pre-censorship notice** shows Defendants were warned of First Amendment
22 violations but proceeded to delete 33 public comments (Exhibit L, EX029) and block Plaintiff's
23 Audit Reno page (Exhibit L, EX030). This proves ongoing retaliation post-dismissal (Exhibit K),
24 leaving **no genuine dispute of material fact**. No reasonable jury could find Defendants' actions
25 justified, entitling Plaintiff to **summary judgment as a matter of law**.
26
27

1 **Qualified Immunity Defeat:**

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3 Defendants' actions contravene clearly established rights (*Pearson, Harlow, Kingsley, Knight,*
4 *Garnier*). The censorship **post-notice** shows objective unreasonableness. "Security" or
5 "moderation" defenses fail under *O'Connor-Ratcliff, Nieves*, and *Kingsley* standards.
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9 **Authentication:**

10 Per Fed. R. Evid. 901, I, Drew J. Ribar, declare under penalty of perjury this email (Bates
11 EX031) was sent by me to Carson City officials on January 19, 2024, and accurately reflects my
12 notice of Defendants' censorship.
13

14 **Dated:** March 27, 2025

15 **/s/ Drew J. Ribar**

16 Drew J. Ribar

17 3480 Pershing Ln, Washoe Valley, NV 89704

18 Tel: (775) 223-7899 | Email: Const2Audit@gmail.com
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AFFIDAVIT OF DREW J. RIBAR AUTHENTICATING EXHIBIT M

I, Drew J. Ribar, declare and state as follows:

1. I am the Plaintiff in the above-captioned matter, proceeding pro se. I make this declaration based on personal knowledge and in support of the attached Exhibit M filed with my Amended Complaint and Summary Judgment Motion in Case No. 3:24-cv-00103-ART-CLB.
2. On January 19, 2024, at 12:52 PM Pacific Time, I authored and transmitted an email from my email address (Const2Audit@gmail.com) to Carson City District Attorney Jason Woodbury and Carson City Sheriff Ken Furlong. The subject line of the email was **“Deleting social media.”**
3. The purpose of the email was to notify Carson City officials that multiple individuals, including myself, observed the Carson City Sheriff’s Office deleting public Facebook comments related to my **August 30, 2022 arrest**, the associated video footage, and criticism of Deputy Jason Bueno’s conduct.
4. The body of the email referenced the **YouTube video** documenting the incident (linked in Exhibit C) and cited *Garnier v. O’Connor-Ratcliff*, then pending before the United States Supreme Court. The message demanded that the Carson City Sheriff’s Office cease its censorship and blocking of public comments on its official Facebook page.
5. I referenced and attached a screenshot titled **“20240119 104539 Facebook.jpg”** to the email, which visually supported my claim that Facebook comments related to my arrest were being deleted. The attachment was sent as part of the same email communication. A copy of that screenshot is available and will be provided to the Court if requested.

6. A true and correct copy of that email, as sent, is attached as **Exhibit M** and has been assigned **Bates No. EX031**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: March 27, 2025

Washoe Valley, Nevada

/s/ Drew J. Ribar

Drew J. Ribar

3480 Pershing Ln

Washoe Valley, NV 89704

Tel: (775) 223-7899

Email: Const2Audit@gmail.com

From: Const2Audit
To: Jason Woodbury; Ken Furlong
Subject: Deleting social media
Date: Friday, January 19, 2024 12:52:59 PM
Attachments: Screenshot_20240119_104539_Facebook.jpg

This message originated outside of Carson City's email system. Use caution if this message contains attachments, links, or requests for information.

Greetings,

People are reaching out to me in the comments section of the Bueno hotboxing video

https://youtu.be/_VDhqHHaw0?si=S7v_u34oxVPz-uWJ

stating the Carson City Sheriff is deleting peoples comments regarding this incident.

The 9th Circuit Garnier v Oconner-Ratcliff, now beofre the Supreme Court ruled that government social media cannot block or sensor people. I recommend listening the the Justices questions <https://youtu.be/wmFgf1Jm1-k?si=LwzH2GEWcutBs3eu>

Please stop blocking people from speaking on social media, spreading and disseminating Deputy Bueno unconstitutional and criminal acts.

Respectfully,

Drew Ribar

Auditing Reno 911

EX031